

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|---------------------------|---|--------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | Case No. 4:17-CR-234 RLW |
| |) | |
| TALAL ABUAJAJ, |) | |
| |) | |
| Defendant. |) | |

DEFENDANT TALAL ABUAJAJ'S MOTION TO CONTINUE TRIAL

COMES NOW Defendant Talal Abuajaj ("Defendant"), by and through his attorney, James W. Schottel, Jr., and for his Motion to Continue Trial, and states to this Honorable Court as follows:

1. This case is set for trial on Monday, April 11, 2022.
2. The parties just engaged in plea negotiations and have not yet reached an agreement.
3. Additionally and alternatively, thousands of pages of documents and hours of video evidence were disclosed and, should this case go to trial, counsel needs additional time to review the documents and have further discussions with Defendant.
4. Further, the undersigned needs additional time to discuss with Defendant, the proposed plea agreement, the effects of signing a plea agreement, the burden of proof and all rights Defendant would be given up.
5. Counsel has discussed the substance of this motion with Mr. Abuajaj and the relief requested herein.
6. Concurrently herewith Defendant Talal Abuajaj files his signed Waiver of Speedy Trial.

7. Defendant, through counsel, hereby respectfully requests a continuance of the trial setting in this case of at least 6 weeks.

8. The undersigned discussed this motion with counsel for the Government, Mr. Mantovanti, and he has no objection to this motion.

WHEREFORE, for the foregoing reasons, Defendant Deandre J. White respectfully requests this Honorable Court to grant his Second Motion to Continue Trial and for such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

SCHOTTEL & ASSOCIATES, P.C.

BY: s/James W. Schottel, Jr.

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Attorney for Defendant
Talal Abuajaj

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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Attorneys for Plaintiff
United States of America

s/James W. Schottel, Jr.